

CC: JAO/RT/IT

ORIGINAL

FILED IN THE  
UNITED STATES DISTRICT COURT  
DISTRICT OF HAWAII

JUN 12 2019

at 11 o'clock and 45 min. A.M.  
SUE BEITIA, CLERK

LS

IN THE UNITED STATES DISTRICT COURT  
FOR THE Hawaii DISTRICT OF Hawaii  
DIVISION

(Write the District and Division, if any, of  
the court in which the complaint is filed.)

Teodor Dimitrov,  
Boris Dimitrov, Daria Dimitrov,  
Sofronii Dimitrov

(Write the full name of each plaintiff who is filing  
this complaint. If the names of all the plaintiffs  
cannot fit in the space above, please write "see  
attached" in the space and attach an additional  
page with the full list of names.)

-against-

Maili TAELE, Caroline Cobangbang,  
Jacob Delaplaine, John C.  
Thompson

(Write the full name of each defendant who is  
being sued. If the names of all the defendants  
cannot fit in the space above, please write "see  
attached" in the space and attach an additional  
page with the full list of names.)

Complaint for a Civil Case  
**CV19 00300 JAO RT**

Case No. \_\_\_\_\_

(to be filled in by the Clerk's Office)

Jury Trial:  Yes  No  
(check one)

**I. The Parties to This Complaint**

**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name  
Street Address  
City and County  
State and Zip Code  
Telephone Number  
E-mail Address

Teodor Dimitrov  
PO Box 4153  
Honolulu  
Hawaii 96812  
808 304 7248  
dimitrov.teo@outlook.com

**B. The Defendant(s)**

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name  
Job or Title  
(if known)  
Street Address  
City and County  
State and Zip Code  
Telephone Number  
E-mail Address  
(if known)

Maili Taele

Defendant No. 2

Name  
Job or Title  
(if known)  
Street Address  
City and County

Caroline Cobangbang

State and Zip Code \_\_\_\_\_  
Telephone Number \_\_\_\_\_  
E-mail Address \_\_\_\_\_  
(if known) \_\_\_\_\_

Defendant No. 3

Name Jacob Delaplaine  
Job or Title \_\_\_\_\_  
(if known) \_\_\_\_\_  
Street Address \_\_\_\_\_  
City and County \_\_\_\_\_  
State and Zip Code \_\_\_\_\_  
Telephone Number \_\_\_\_\_  
E-mail Address \_\_\_\_\_  
(if known) \_\_\_\_\_

Defendant No. 4

Name John C. Tomphson  
Job or Title \_\_\_\_\_  
(if known) \_\_\_\_\_  
Street Address \_\_\_\_\_  
City and County \_\_\_\_\_  
State and Zip Code \_\_\_\_\_  
Telephone Number \_\_\_\_\_  
E-mail Address \_\_\_\_\_  
(if known) \_\_\_\_\_

**II. Basis for Jurisdiction**

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (check all that apply)

Federal question

Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

**A. If the Basis for Jurisdiction Is a Federal Question**

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

1. Mine and my children right for fair trial under const.
2. Rights guaranteed to dual citizens under treaties for which US is a side.

**B. If the Basis for Jurisdiction Is Diversity of Citizenship**

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, (name) \_\_\_\_\_, is a citizen of the State of (name) \_\_\_\_\_.

b. If the plaintiff is a corporation

The plaintiff, (name) \_\_\_\_\_, is incorporated under the laws of the State of (name) \_\_\_\_\_, and has its principal place of business in the State of (name) \_\_\_\_\_.

*(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)*

2. The Defendant(s)

a. If the defendant is an individual

The defendant, (name) \_\_\_\_\_, is a citizen of the State of (name) \_\_\_\_\_. Or is a citizen of (foreign nation) \_\_\_\_\_.

My three minor children have been in State of Hawaii custody; Department of Human Services; East Oahu Child Welfare Services Unit 4 since October 2018, in my view illegally.

After finding myself in the predicament of not being able to afford attorney for the legal procedures, I was assigned one by the court Ms. Crystal Asano. To my bewilderment the assigned attorney did not use any of the protections or defenses afforded by law, but only blindly followed what the State of Hawaii through its agents required from the court which always were prolongation of the situation in order to secure more funding from the state for everyone involved at the expense of my health and wellbeing, and the health and wellbeing of my minor children - Boris Dimitrov twelve years old, Daria Dimitrov eleven years old, and Sofronii Dimitrov nine years old.

Confined in this helpless state by the greed for state funding expressed in the abuse of court procedures and the neglect of mine and my children rights guaranteed by Family Court procedures, I was forced to take the disadvantageous path to represent myself with Mr. Jacob Delpane, Esq. as stand by counsel (as advised by the court).

As forced by need and lack of viable options self-represented side in The Family Court my case was permanently stuck in nowhere. At that time in place of desperation and fear, as me and my children are dual US/Bulgarian citizens I started seeking assistance from the Bulgarian Embassy in The United States, and The Consulate General of Bulgaria in Los Angeles. I was forced to do that, because I was denied access to the case file in order to prepare for court, basically denied fair trial. The numerous requests of the Bulgarian Consulate, and other Bulgarian Authorities, including the Administration of The President of Bulgaria were all dismissed. Complete set of documents is not provided to me or the Bulgarian Authorities to this day - June, 12 of 2019.

In the mean time I became target of harassment in the State of Hawaii in my view by law enforcement personnel if not agencies to the point that I find it impossible to reside in the State of Hawaii without damage to my physical and mental health.

There were serious suspicions of my daughter being victim of crimes of sexual nature while in state custody. I reported my fears to all relevant authorities and all sides involved in this here complaint to no result up until this day. Instead all my three children are in psychiatric and psychological treatment and therapy.

I have sleeked help everywhere help can be found, almost every state agency in the judiciary, legislature, law enforcement state and federal to absolutely no result but experiencing increased in strength and ways harassment. I am at the end of my human strength and my mental capabilities, I am in need of immediate relief and so are my minor children.

I am not able to provide complete statement of facts due to English not being my first language; I am in dire need of interpreter, especially in formalized court documentation filing. I'll be able to state the facts clearly with the assistance of Bulgarian Interpreter.

I have attempted to secure legal help at every place such is offered to low income immigrants like myself with no success.

b. If the defendant is a corporation

The defendant, (name) \_\_\_\_\_, is incorporated under the laws of the State of (name) \_\_\_\_\_, and has its principal place of business in the State of (name) \_\_\_\_\_. Or is incorporated under the laws of (foreign nation) \_\_\_\_\_, and has its principal place of business in (name) \_\_\_\_\_.

*(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)*

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

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**III. Statement of Claim**

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

*see attached*

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**IV. Relief**

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

1. Order release to me of all court and medical documents. ~~includ~~
2. Provide complete funding for all medical and therapy bills now and in the future for my three minor children

**V. Certification and Closing**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

**A. For Parties Without an Attorney**

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: June 12, 2019.

Signature of Plaintiff

Printed Name of Plaintiff

Teodor Dimitrov

**B. For Attorneys**

Date of signing: \_\_\_\_\_, 20\_\_.

Signature of Attorney \_\_\_\_\_

Printed Name of Attorney \_\_\_\_\_

Bar Number \_\_\_\_\_

Name of Law Firm \_\_\_\_\_

Address \_\_\_\_\_

Telephone Number \_\_\_\_\_

E-mail Address \_\_\_\_\_